

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

EDWARD HURTWITZ,
Plaintiff,

v

PINNACLE FINANCIAL GROUP,
Defendant.

Edward Hurtwitz
Plaintiff In Pro Per
2228 Rochester Court
Troy, MI 48083
(248) 266-8024

Steven A. Siman (P20480)
Steven A. Siman, P.C.
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NOTICE OF REMOVAL OF ACTION UNDER 28 U.S.C. § 1441(b)
(FEDERAL QUESTION)

PLEASE TAKE NOTICE that Defendant, Pinnacle Financial Group, LLC (hereinafter "Pinnacle") hereby removes the state court action described below to federal court.

1. On November 25, 2013, Plaintiff Edward Hurtwitz, commenced a small claims action in the 52-4 Judicial District Court, Oakland County, State of Michigan, entitled and captioned: *Edward Hurtwitz vs Pinnacle Financial Group, LLC* (hereinafter "Defendant"), Case No. 13 CO2909 SC. A copy of the summons and complaint received by Defendant is attached and marked as Exhibit "A".

2. This action is a civil action of which this Honorable Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court by Defendants pursuant to 28 U.S.C. § 1441(b) in that it presents federal questions, in that Plaintiff alleges violations of 15 U.S.C. § 1692 *et seq.*, the Fair Debt Collection Practices Act ("FDCPA") and violations of 15 U.S.C. § 1681 *et seq.*, the Fair Credit Reporting Act ("FCRA").

3. This removal is timely pursuant to 28 U.S.C. § 1446(b).
4. To the best of the undersigned's knowledge, no other pleadings or documents, other than the summons and complaint attached hereto, have been filed in this matter.
5. As required by 28 U.S.C. § 1446(d), Defendant will give notice of the filing of this notice to the Plaintiff and to the clerk of the 52-4 Judicial District Court where the action is currently pending.

WHEREFORE, Defendant respectfully requests that the above captioned matter currently pending in the 52-4 Judicial District Court, be removed to Federal Court.

Respectfully submitted,
STEVEN A. SIMAN, P.C.

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Dated: January 6, 2014